		De we 130			D	1 2 2
		Page 130			Page	132
1	E. SLININ		1	E. SLININ		
2	and he was handling all the		2	look for it.		
3	administrative part of the business.		3	Q. Okay.		
4	Meaning, Rob Lee, him, his attorney,		1	Do you know what do you		
5	Marechal, in Switzerland, everything		5	recall what bank account you paid them		
6	was handled by Mr. Shnaider or his		6	out of?		
7	team.		7	A. I don't recall.		
8	Q. That was done in either		8	Q. Do you have any documents		
9	Toronto, or Switzerland, or Moscow; is		9	that would reflect your payments to		
11	that correct?		10 11	Mr. Kopkin of fees? A. Yes.		
12	A. Correct. Exactly,		12			
13	everything comes to administrative.		13	Q. We talked a fair amount		
14	He said, "Eddie, I will handle that			prior to our lunch about Mr. Pirumov;		
15	don't worry. I know, I have been		14 15	do you recall that?		
16	there, done it." I said, "No problem, Alex, I don't have that kind of		16	A. Yes.		
17	experience as you, deal with it," and		17	Q. I believe that you said that		
18	that is it. That is my understanding		18	you don't recall having any ownership in any entity with Mr. Pirumov;		
19	with him,		19	correct?		
20	Q. I am simply trying to		20	A. Mr. Pirumov, correct.		
21	determine if your position is that		21	Q. I am never going to get it		
22	your right that you allege in the		22	right.		
23	contract strike that.		23	Λ. Yes.		
24	I am trying to determine if		24	Q. What about now, it's		
25	your position that your rights that		25	going to get worse Mr.		
-		Page 131			Page	133
1	E. SLININ		1	E. SLININ		
1 2	you allege in this Complaint arise out		2	Sheikhametov?		
3	of your ownership interest in CAC and		3	A. Mr. Sheikhametov.		
4	CL850, or whether you are asserting		4	Q. Did you have any interest,		
5	they arise out of something in		5	finance interest, in any entity where		
6	addition to that; that's all?		6	Mr. Sheikhametov also had a financial		
7	A. I was a partner, and in		7	interest?		
8	fact, Mr. Shnaider, during his		8	A. No.		
9	testimony in Russia said that I am		9	Q. Prior to the aircraft that		
10	owner of Challenger 850.		10	are the subject of this lawsuit, did		
11	Q. So, it's your position that		11	you have any business dealings with		
12	your rights, as a partner with		12	Mr. Pirumov?		
13	Mr. Shnaider, arise out of your		13	A. No.		
14	interest in CAC and CL850; is that		14	Q. What about with Mr.		
15	correct?		15	Sheikhametov?		
16	A. Correct; that was my		16	A. No.		
17	understanding.		17	Q. Do you know someone by the		
18	Q. You mentioned prior to the		18	name of Vasiliev?		
19	break that you paid some fees, legal		19	A. Alex Shnaider's partner.		
20	fees to Mr. Karim in Russia; correct?		20	Q. You believe that he was a		
21	A. Correct.		21	partner of Alex Shnaider?		
22 23	Q. Do you know if you have any		22 23	A. Yes, he was a partner.		
24	invoices corresponding to the fees that you paid?		24	Q. Okay. A partner in what, sir?		
	A. I don't recall, but we can		25	A partner in what, sir? A. I don't know; some entity in		
25						



		7.24	<u> </u>		D	126
		Page 134			Page	136
1	E. SLININ		1	E. SLININ		
2	Russia.		2	A. Same thing.		
3	Q. Did you know Mr. Vasiliev?		3	Q. So, you believe it's		
4	A. I saw him in Moscow with		4	organized in the British Virgin		
5	Alex Shnaider a few times. We were		5	Islands?		
6	going out to eat, have dinner, so he		6	A. Somewhere, BVI, yeah.		
7	came along a couple of times.		7	That's what Alex was telling me.		
8	Q. How did you meet Mr.		8	Q. Do you know what type of		
9	Vasiliev?		9	entity CL850 was?		
10	A. During the dinner with Alex		10	A. The same.		
11	Shnaider in Moscow.		11	Q. A limited liability company?		
12	Q. Mr. Shnaider introduced you		12	A. Correct, correct.		
13	to Mr. Vasiliev?		13	Q. Do you know if any documents		
14	A. Correct.		14	were filed to organize strike that.		
15	Q. What, as you understand it,		15	Do you know if any documents		
16	were your responsibilities for the		16	were filed to create CAC as a limited		
17	sale of the aircraft that are the		17	liability company?		
18	subject of this lawsuit; if any?		18	A. It was done by Alex		
19	A. My job was to bring the		19	Shnaider, Rob Lee, and		
20	buyers, and they bought those		20	Q. I am not asking who did it.		
21	aircrafts, and I was partners with		21	I am asking if you know whether there		
22	Alex Shnaider, 50/50.		22	were any documents?		
23	Q. That's not my question. My		23	A. I don't know.		
24 25	question refers only to your job. What was your job, to bring		24 25	Q. Do you know if any documents were created to organize CL850?		
20	What was your job, to oning	Page 135		were elected to organize CE050.	Page	137
1	E OLININI	-	1	E. SLININ	:=0	
1	E. SLININ		2	A. I don't know.		
3	the buyers? A. To bring the buyers.		3	Q. Do you know who was		
1	Q. Okay.		4	identified as the owner or owners of		
5	Did you have any other jobs?		5	CAC when CAC was organized?		
6	A. No.		6	A. I don't know.		
7	Q. Did you have a title in any		7	Q. Same question for CL850.		
8	of the strike that.		8	A. I don't know.		
9	Do you know where CAC is		9	Q. You said that your job was		
10	incorporated?		10	to bring the buyers of the aircraft to		
11	A. No.		11	CAC and CL850; is that correct?		
12	Q. Do you know what type of		12	A. Correct.		
13	entity CAC is?		13	Q. And did you bring buyers?		
14	A. Some kind of BVI company.		14	A. Yes, I did.		
15	Q. Do you know if it's a		15	Q. Okay.		
16	corporation or a partnership?		16	How many?		
1 <mark>7</mark>	A. I think it's a limited		17	A. Two.		
18	liability company.		18	Q. Was that Mr. Pirumov and Mr.		
19	Q. You don't know where, I mean		19	Sheikhametov?		
20	physically, where it's organized;		20	A. Yes.		
21	correct?		21	Q. And how many aircrafts		
22	A. No; somewhere in British		22	between the two of them did they		
23	Virgin Islands.		2.3	contract to purchase; if you know?		
24 25	Q. What about CL850, do you		24	A. Seven.		
	know		25	Q. And they contracted to		



		Page 1	38		Page	140
1	E. SLININ		1	E. SLININ		
	purchase these aircrafts either with		2.	transferred to one or more companies		
3	CAC or CL850; correct?		3	owned by you from Mr. Pirumov?		
4	A. Correct.		4	A. It was me and Mr. Shnaider.		
5	Q. I think we established		5	Q. I'm sorry. Hold on.		
6	earlier this morning that they agreed		6	A. I want to make sure we are		
7	with CAC or CL850, whoever the		7	on the same page.		
8	contracting party was, that they would		8	Q. No, no, no.		
9	not be entitled to a refund of their		9	You said some of the		
10	deposit; correct?		10	entities were owned by you, and some		
11	A. Correct.		11	of the entities were owned by Mr.		
12	Q. When take Mr. Pirumov,		12	Shnaider.		
13	when he or his companies placed		13	A. Correct.		
14	deposits for the purchase of these		14	Q. So, my questions are going		
15	aircrafts, did he transfer money some		15	to be only the entities owned by you.		
16	place?		16	A. Correct. We received funds,		
17	A. Yes, he did.		17	we then transfer whatever the deposits		
18	Q. And where did he transfer		18	to Bombardier, we put up a deposit for		
19	money to? I don't mean the physical		19	the five aircrafts that he purchased,		
20	location, but what entity or		20	and there was a delta left that we		
21	individual did he transfer money to?		21	split 50/50 with Alex Shnaider.		
22	A. I don't remember. Some of		22	Q. Okay.		
23	the entities were mine, some of um,		23	So, you have told me that		
24	was um, um, Alex Shnaider.		24	one or more entities owned by you, the		
25	Q. Okay.		25	name or names of which you don't		
		Page 1:	39		Page	141
1	E. SLININ		1	E. SLININ		
2	So, you believe that Mr.		2	recall, received money from		
3	Pirumov transferred the deposit funds,		3	Mr. Pirumov as deposits; correct?		
4	at least in part, to an entity owned		4	A. Correct.		
5	by you; is that correct?		5	Q. Okay.		
6	A. Correct.		6	And did those funds		
7	Q. Do you know how much was		7	strike that.		
8	transferred to an entity or entities		8	Did the portion of those		
9	owned by you from Mr. Pirumov?		9	funds that were received by one or		
10	A. I don't know the exact		10	more entities owned by you, that were		
11	amount. I can't remember that.		11	needed to make deposits from		
12	Q. How about a general amount?		12	Bombardier, get transferred directly		
13	A. About \$19,000,000.		13	from your company or companies to		
14	Q. 19,000,000?		14	Bombardier?		
1.5	A. 19 and change.		15	A. Correct.		
16	Q. And what entity or entities,		1.6	Q. Do you have any idea what		
17	owned by you, did Mr. Pirumov transfer		17	the delta was between the		
18	this approximately \$19,000,000 to?		1.8	approximately 19,000,000 that was		
19	A. I don't remember the name of		19	received by one or more companies that		
20	the I mean, we have it. I don't		20	were owned by you, and the amount that		
21	remember the name. I have to look it		21	was transferred to Bombardier?		
22	up.		22	A. I don't remember. The		
23	Q. Okay.		23	records are there. Everything is		
24 25	What did you do with this		24	there. I don't recall now, I can't		
7.5	approximately \$19,000,000 when it was		25	remember.		



	Page 142			Page	144
1	E. SLININ	1	E. SLININ		
2	Q. Do you know if it was more	2	Q. Did you hold any title as an		
3	than 1,000,000?	3	officer in CAC?		
4	A. It was more.	4	A. No.		
5	Q. More than 5,000,000?	5	Q. What about CL850?		
6	A. Again, I can't remember.	6	A. No.		
7	Q. Let's take Mr. Sheikhametov,	7	O. Have strike that.		
8	he contracted to purchase some of the	8	Are you familiar with a		
9	seven aircrafts we have been referring	9	promissory note and guarantee for		
10	to; correct?	10	4.450 million dollars between one of		
11	A. Correct.	11	your companies and Midland Resources,		
12	Q. Do you recall how many?	12	sir?		
13	A. Two Challenger 850s.	13	A. Yes, I do.		
14	Q. Two?	14	Q. Can you tell me		
15	A. Correct.	15	approximately strike that.		
16	Q. How many did Mr. Pirumov	16	Let's go ahead and mark this		
17	contract to purchase?	17	as 11.		
18	A. Five.	18	(Whereupon, a promissory		
19	Q. And did Mr. Sheikhametov	19	note was marked as Slinin Exhibit		
20	also make deposits?	20	11, for identification, as of		
21	A. Yes, he did.	21	this date.)		
22	Q. And where did those deposits	22	Q. I have placed before you		
23	go when he made them initially?	23	Slinin 11. It's a promissory note		
24	A. They went, again, the same	24	dated December 28, 2008. It also		
25	way, through either my company or	25	contains a guarantee dated December 29		
	Page 143			Page	145
1	E. SLININ	1	E. SLININ		
2	Alex, and then to pay to Bombardier.	2	it's a promissory note dated		
3	Q. Do you know if the deposits	3	December 29th, 2008. It also contains		
4	that Mr. Sheikhametov made went to a	4	a guarantee dated the same date, and		
5	company or companies owned by you, or	5	for the record and an		
6	whether they went to a company or	6	acknowledgment on the last page dated		
7	companies owned by Mr. Shnaider?	7	December 26, 2008.		
8	A. I don't remember exactly.	8	MS. DYER: For the record,		
9	Q. Then some portion of those	9	this document Slinin Exhibit 11		
10	deposits in turn were paid to	10	is AS0006517 through AS0006529.		
11	Bombardier; is that correct?	11	Q. Do you recognize this		
12	A. Correct. The large portion	12	exhibit that I placed before you, sir?		
13	was paid to Bombardier. There was a	13	A. Yes, I do.		
14	delta left that was split between me	14	Q. Can you tell me what it is?		
15	and Alex Shnaider.	15	A. A promissory note that I		
16	Q. Did you create a company or	16	signed. It's basically demonstrated		
17 18	companies, specifically, to receive	17 18	the partnership with Mr. Shnaider. I		
19	the deposits from Mr. Pirumov or Mr. Sheikhametov?	19	want to make sure it's on the record. Q. You have, but		
20		20			
21	A. I don't remember exactly. On Proving Property of CAC had a	21	A. Counsel, I have to explain to you.		
22	Q. Do you know if CAC had a bank account?	22	Q. Hold on, hold on.		
23	A. I would not know.	23	I asked if you recognize it.		
24	Q. Same question for CL850?	24	A. Yes, I do.		
25	A. I don't know.	25	Q. It's a promissory note;		

		Page 146			Page	148
1	E. SLININ		1	E. SLININ		
2	correct?		2	or transfer any interest in any		
3	A. Yes.		3	contracts for the sale of aircrafts as		
4	Q. There is a personal		4	part of the guarantee?		
5	guarantee there, sir?		5	A. Yes, the two contracts for		
6	A. Yes, there is.		6	Mr. Sheikhametov, which is considered		
7	Q. The promissory note is		7	\$4,000,0000. This was pledged, which		
8	between All City Funding and Midland		8	had ownership by Mr. Shnaider at the		
9	Resources?		9	time, until this two positions were		
10	A. Correct.		10	liquidated.		
11	Q. All City Funding is a		11	Q. Okay.		
12	company that is owned by you?		12	At the time of this		
13	A. Yes.		13	promissory note, and let me draw your		
14	Q. Midland Resources is a		14	attention to AS0006518.		
15	company that is owned in part by Mr.		15	A. Yes.		
16	Shnaider?		16	Q. At the time of this		
17	A. Correct.		17	promissory note, did you pledge an		
18	Q. Did you have any ownership		18	interest that you had in what is		
19	interest in Midland Resources?		19	referred to under "payment from		
20	A. No.		20	contract disposition proceeds 161 and		
21	Q. Have you ever had any		21	162?"		
22	ownership?		22	A. Correct.		
23	A. No.		23	Q. What interest, at that		
24	Q. Was All City Funding a		24	time and again, we are looking at		
25	borrower under this promissory note?		25	December 29th, 2008, did you have in		
		Page 147			Page	149
1	E. SLININ		1	E. SLININ		
2	A. Yes.		2	C8500161?		
3	Q. Was Midland Resources the		3	A. We bought those positions		
4	lender?		4	back from Sheikhametov.		
5	A. Yes.		5	Q. Okay.		
6	Q. Did you, Mr. Slinin,		6	When did you buy them back?		
7	personally provide a collateral		7	A. About that date, which is		
8	agreement to collateralize well,		8	the December 29th, 2008.		
9 10	strike that.		10	Q. When you say, "we bought		
11	To guarantee this promissory note?		11	those positions back," you mean you bought the right to the Contract 161		
12	A. It was guaranteed by me,		12	from Mr. Sheikhametov?		
13	yes.		13	A. Yes, me and Alex Shnaider		
14	Q. What did you provide for		14	together, collectively, bought the		
15	collateral, sir?		15	positions back, and Alex Shnaider		
16	A. My personal guarantee.		16	wanted to make sure to have a skin in		
17	Q. Did you actually pledge any		17	the game, as a partner		
18	collateral to personally guarantee		18	Q. I'm		
19	that?		19	A. I need to make sure, let me		
20	A. My signature is good enough.		20	finish		
21	Q. Did you pledge any interest		21	Q. I am not trying to cut you		
22	in any assets?		22	off		
23	A. It was All City Funding,		23	A. But this is my sense, I have		
2.4	that was a personal guarantee.		24	to put it on the record. It's very		
25	Q. Did you pledge any interest		25	important.		



		EAL				150
	Page 1	.54			Page	156
1	E. SLININ		1	E. SLININ		
2	Q. That would be \$2,000,000;			for the full 2,000,000 under each		
3	correct?			contract; correct?		
4	A. Correct.		4	A. Yes.		
5	Q. So, you pledged \$2,000,000		5	Q. 2,000,000 under Contract		
6				161?		
7	A. Additional.	- 1	7	A. Yes.		
8	Q. Under the guarantee here?	- 1	8	Q. And 2,000,000 under Contract		
9	A. That is correct.			162?		
10	Q. When you say, "additional"	11		A. Correct.		
11 12	A December tout minutes if me	1:		Q. So, you pledged one hundred		
13	A. Because technically, if me			percent of the interest in each of the		
14	and him me and Alex Shnaider are	11.		two contracts; correct?		
	50/50. He holds those two positions,	11		A. Correct.		
15 16	which total \$4,000,000 already in his possession worth of contracts for the	1		Q. What did you do with the \$4,000,000 or \$4,450,000 under this		
1.0	planes. He said to me the following,	1.		promissory note?		
18	"If I were not able to liquidate the	11		A. Alex received 450,000 right		
19	two positions, you will be liable for	1		there and then.		
20	this money." I said, "Alex I have no	20		Q. So, you paid Mr. Shnaider		
21	problem." He said, "Because you have	2		450		
22	to have the skin in the game. You are	2		A. Yes. 4,000,000 he refunded		
23	my partner. If you don't have the	2		back to Mr. Sheikhametov.		
24	cash available this time, I am willing	2		Q. 4,000,000 was refunded back		
25	to provide you that that money, but	2	5	to Mr. Sheikhametov?		
	Page 1	55			Page	157
1	E. SLININ		1	E. SLININ		
2	we are 50/50 until we liquidate those		2	A. Mr. Sheikhametov.		
3	positions. If we take a loss, I want		3	Q. Okay.		
1	you to hold responsible for the	'	4	 A. It was refunded more because 		
5	losses."			we took him from 5,000,000 over		
6	Q. Okay.			5,000,000 in deposits. I refunded		
7	So, if there was not a			whatever the profit margin was there,		
8	liquidation of these			Alex kept his profit margin. I end up		
9	A. I would have been liable.			returning to Mr. Sheikhametov the		
10	Q. Hold on.	10		profit margin, and then the \$4,000,000		
11	If there was not a	11		was repaid back to him from Alex.		
12 13	liquidation of Contract 161 and 162,	12		Q. That's my next question.		
14	it's your belief that Mr. Shnaider told you that you would have been	14		Where did the 4,000,000 come from to pay Mr. Sheikhametov back?		
15	liable for the \$4,450,000 under the	1.5		A. From Alex Shnaider.		
16	promissory note?	1.6		Q. And so in exchange for this		
17	A. It was only 4,000,000. 450	11.		promissory note, that you signed on		
1.8	got paid right away, right there and	118		behalf of All City Funding, Mr.		
19	then.	129		Shnaider repaid the \$4,000,000 in		
20	Q. Okay.	20		deposits that Mr. Sheikhametov had		
21	You would have been liable	2:		paid; correct?		
22	for \$4,000,000 under these two	22		A. Correct.		
23	contracts?	23		Q. Okay.		
24	A. Yes.	24	4	Mr. Sheikhametov had made		
25	Q. You would have been liable	25	5 (those deposits to purchase an		

